

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE**

In re:

FTX TRADING LTD., *et al.*,

Debtors.

FTX TRADING LTD., *et al.*,

Plaintiffs,

-against-

LOREM IPSUM UG, *et al.*,

Defendants.

Chapter 11

Case No. 22-11068 (JTD)

(Jointly Administered)

Adv. Pro. No. 23-50437 (JTD)

MOTION TO DISMISS FOR LACK OF SUBJECT MATTER JURISDICTION

Defendant, Brandon Williams, moves as to Counts One and Two of the Complaint under Fed. R. Bankr. P. 7012(b) and Fed. R. Civ. P. 12 (b)(1) to dismiss this adversary proceeding for lack of subject matter jurisdiction. The grounds for this motion are set forth and discussed in the accompanying Brief, which incorporates by reference the matters and facts and cited authorities and accompanying exhibits in the Motions of Patrick Gruhn, Robin Matzke and Lorem Ipsum UG to Dismiss the Bankruptcy Cases of Maclaurin Investments, Ltd. and FTX Trading Ltd. [D.I. 3399, 3400]. This motion supplements and does not withdraw the Motion to Dismiss or For Summary Judgment filed by Brandon Williams on October 25, 2023, in the above adversary proceeding. [D.I 23]

To preserve his right to a jury trial in the event his motion is not granted, Brandon Williams does not consent to the Bankruptcy Court entering final judgment but reserves the right to do so at a later date.

WHEREFORE, Brandon William respectfully requests that the Court GRANT the Motion to Dismiss for Lack of Subject Matter Jurisdiction and grant such other and further relief as the Court finds just and appropriate.

/s/ Gregory L. Arbogast
Lawrence J. Gebhardt (*pro hac vice*
pending)
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CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on this 3rd day of November, 2023, copies of the Motion to Dismiss for Lack of Subject Matter Jurisdiction and Opening Brief in support thereof were electronically filed with the Clerk of the Bankruptcy Court for the District of Delaware using the CM/ECF system. Notice of these filings will be sent to all parties authorized to receive electronic notice in this case.

/s/ Gregory L. Arbogast
Gregory L. Arbogast